

Cranborne Chase AONB: Position on Bonham Plain Afforestation Scheme, Wiltshire

Cranborne Chase Area of Outstanding Natural Beauty (AONB) Partnership is deeply concerned by a largely coniferous planting scheme agreed and grant aided by the Forestry Commission (FC) which will see the public funding of an 87.1 hectare afforestation project in the west of this protected landscape on Bonham Plain, adjacent to the Stourhead Estate in Wiltshire.

Encouraged and approved by the Forestry Commission, and funded through government grant aid, the planting of an 80% non-native commercial conifer forest will have significant and detrimental impacts on the Greensand Terrace Landscape Character Area (LCA), the least wooded LCA in the AONB. The planting will permanently change its character and views to and from the area for decades to come.

Neither an Environmental Impact Assessment (EIA) nor a Landscape and Visual Impact Assessment (LVIA) were carried out as both were deemed unnecessary by the Forestry Commission; contrary to the Forestry Commission's own UK Forestry Standard. This is also in direct breach of Section 85 of the Countryside and Rights of Way Act 2000, that states:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

Additionally, afforestation proposals do not normally require an EIA if on 'low risk land' (eg agricultural land classed as Grade 3b and lower). However, Bonham Plain is within the nationally designated AONB (ie high risk) and is Grade 2 Agricultural Land (the best and most versatile land) and therefore both of these criteria are considered 'high risk' and should trigger an EIA.

The AONB Partnership is deeply troubled that the Commissioners at the Forestry Commission have determined to dismiss the AONB Partnership's objection to this 87.1ha afforestation scheme.

Trees are a vital part of some of the Cranborne Chase AONB landscape, contributing to its character and an essential part of its biodiversity. However, the wrong trees in the wrong place can have a lasting and damaging impact on the character of this nationally significant landscape and the public's appreciation and enjoyment of it.

The AONB Partnership asserts that the Forestry Commission South West (FCSW) failed to separate their role of promoting and facilitating the production of a woodland creation design plan in an AONB from their responsibility to evaluate it objectively in line with their CRoW Act duty and their own UK Forestry Standard. FCSW has effectively approved a project that they had themselves encouraged to be put forward. In so doing, a number of short cuts, errors and omissions have occurred. Decisions on landscape and AONB matters were made without evidence of appropriate professional input, setting to one side this AONB's recommendations to assess the landscape impacts at an early stage. That combined process of assisting and then approving a major afforestation scheme was then rolled forward to an England Woodland Creation Offer (EWCO) application for funding. At all stages, the AONB Partnership believes precedence has been given to planting trees and not to conserving and enhancing a nationally important and nationally designated landscape.

The Forestry Commissioners did not engage directly with the AONB Partnership or its staff, with our documentation being processed and rebutted by FC staff. The AONB believes Commissioners have been misled, having received an unbalanced view of the matter. The AONB also feels strongly that submissions on conserving and enhancing natural beauty to FCSW have been evaluated by FC staff who do not have appropriate AONB knowledge or experience.

The AONB Partnership fears that this sets a concerning precedent for the approval of future schemes across Cranborne Chase AONB and protected landscapes nationally.

The following concerns have been raised with the Forestry Commission by the AONB, alongside concerns from the owner of Bonham Manor:

The approval processes are unsound on a number of counts:

1. The Forestry Commission (FC) has provided no evidence that the project conserves and enhances the landscape of the AONB, a fundamental requirement of the Countryside and Rights of Way (CROW) Act 2000 for any project in an AONB. Neither an Environmental Impact Assessment (EIA) nor a Landscape and Visual Impact Assessment (LVIA) were carried out. The AONB believes the FC is in breach of their statutory duties under the CROW Act 2000.
2. It is inconceivable that for a scheme of this magnitude (87.1h) the FC did not require an independent landscape and visual impact appraisal, despite being advised to do so by the AONB Partnership, and, without that evidence, formally agreed that an Environmental Impact Assessment would not be needed.
3. FCSW breached the Commission's own guidance and regulations in facilitating the proposed scheme and grant aid submission, and pre-determined the EIA screening:
 - a. The EIA (Forestry) Regulations 1999 (rev 2006/2017) Schedule 2 state that any afforestation of more than 50ha or of which any part is in an AONB – this is both – is likely to have a significant impact on the environment and would require an EIA and thorough public consultation. It is significant that, in 2019, before project plans had been settled and long before the FC statutory consultation for EIA Screening, the promoter's consultant wrote in response to the AONB's guidance that the FC had already signified no EIA or LVIA would be required (qv p54 WCDP v2.0) despite being within the bounds of a significant environmental asset;
 - b. On 9 July 2021, the FC determined that neither FC Consent nor an EIA for the project was required. The FC was asked for its reasoning but did not disclose it until they had embarked upon a dispute procedure with this AONB in January 2023.
4. FCSW did not consult an 'appropriate countryside body' such as Natural England during the EIA Screening process, despite that being a requirement of EIA (Forestry) Regulations 1999 (rev 2006/2017).
5. The FC and applicant disregarded the agricultural value in its EIA checklist (disclosed Feb 2023), by falsely claiming that the project area is 'unfavourable arable land' when it is unequivocally classified under the national Agricultural Land Classification scheme as grade 2 'best and most versatile agricultural land'. Whilst the FC's marketing of afforestation grant schemes emphasises they are aimed at marginal and unproductive land it is misleading, to say the least, to seek to downgrade the Agricultural Land Classification, to enable it to be eligible for afforestation.
6. FCSW's lack of effective public engagement with the public or directly affected parties, a requirement of the UK Forestry Standard with which England Woodland Creation Offer (EWCO) grant applications must be compliant:
 - a. The Forestry Commission does not appear to have formally consulted the Parish Council. When, as a courtesy, in Aug 2019, the Parish Council was shown an early version of the project *by the applicant*, all members of public present expressed serious concerns. Nevertheless, a reduced quorum of the Parish Council confirmed no objection in principle subject to views of local residents being taken into account. The FC misleadingly interpreted this as full support.
 - b. The neighbouring owner's detailed first stage representation 13 Aug 2019 was conspicuously omitted from the Woodland Creation Design Plan (WCDP) FC-approved-29-04-2020 (qv Appendix 7h, page 63)
 - c. Long after FC approval of the WCDP April 2020 and conclusion of the EIA Screening July 2021, the scheme was made available to the public on the Public Consultation Register for grant applications in Nov 2021. The scheme should have been available on the Public Register before decisions were made. There were 76 public responses, 85% of which were objections. Virtually all comments were 'acknowledged and closed' by the FC, presumably since approval had already been given.
 - d. The FC's July 2021 decision not to require consent (nor EIA/LVIA) was not published on its own Decision Register, due the FC says to 'an oversight'.
7. The EWCO grant application falsely claimed the project was not in any Designated Area. It is manifestly obvious the entirety of it is within an AONB.

8. It is a requirement of the UKFS that an analysis of Visual Sensitivity from neighbouring dwellings is carried out. No such analysis has been undertaken – the FC has been reminded of this on several occasions; if one has been done, it has not been shown to those most affected. The only image of what it could look like is a starkly unrepresentative sketch at Appendix 8 of the WCDPv2.0 FC-approved-29-04-2020.
9. The Historic Impact Assessment (HIA) produced by the promoter to the FC was deeply flawed, declared the heritage assets to be ‘not understood’ and arrived at inaccurate conclusions. Historic England states it was not consulted until after the FC had agreed and approved the planting plans.
10. The FC approved project will cause significant seasonal overshadowing of nationally important GII*/GII Listed heritage assets occluding direct sunlight for several months of the year. This has been confirmed by expert daylighting professionals. The impact will be deleterious and blight the assets. The FC has failed to take this report on board. The ‘compromise’ minor adjustments agreed between the FC and the applicant (without the involvement of those most affected) do not offset the primary cause of overshadowing. The owner of Bonham Manor offered constructive suggestions for reasonable setbacks to obviate the problem; these have been disregarded by the FC.
11. It is hard to see how the FC’s conduct has complied the Seven Nolan Principles of Public Life as to honesty and transparency in public service. There is clearly conflict of interest when an authority approves projects the design of which it has abetted and grant-aided, does not deal objectively within the legislation, and chooses to ignore manifest verifiable facts.
12. The FCSW staff who made the ‘no need for LVIA or EIA’ decisions did not have appropriate professional landscape qualifications.

-ENDS-

Note for Editors:

An AONB is one of the nation’s finest landscapes; an outstanding landscape whose distinctive character and natural beauty are so precious that it is in the nation’s interest to safeguard them. Designation is under the Countryside and Rights of Way Act 2000

The AONB designation is nationally important, with the purpose of ‘conserving and enhancing natural beauty’. The Countryside and Rights of Way (CRoW) Act 2000 brought in measures to protect AONBs further and confirmed that AONB landscapes are equivalent in status to a National Park.

Cranborne Chase AONB straddles parts of Wiltshire, Dorset, Hampshire and Somerset. It is deeply rural with a population of just over 33,000. Tisbury is the largest settlement within this national designation; market towns such as Blandford, Shaftesbury, Warminster, Wilton and Wimborne are located just outside the boundary. Cranborne Chase AONB is the 6th largest of the AONB family at 981 sq kms / 380 sq mls. Cranborne Chase AONB is a nationally important living, working, cultural landscape by virtue of its many, and very special, qualities that the combination of nature and human activity maintains.

The statutory purpose of AONB designation is:

- To conserve and enhance the natural beauty of the landscape, including wildlife, scientific and cultural heritage

Two secondary responsibilities are:

- To take account of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities

- To meet the demand for recreation as far as this is consistent with the conservation and enhancement of natural beauty and the needs of agriculture, forestry, and other uses

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